

**United States Bankruptcy Court**  
**Northern District of Illinois, Eastern Division**

IN RE: Jesse Ramirez	)	Chapter 13
	)	Case No. 20 B 04169
Debtor(s)	)	Judge Deborah L. Thorne

**Notice of Motion**

Jesse Ramirez  
4101 N McVicker Ave Apt 1  
Chicago, IL 60634

Debtor Attorney: David M Siegel  
via Clerk's ECF noticing procedures

On August 19, 2020 at 2:30 pm, I will appear before the Honorable Deborah L. Thorne, or any judge sitting in that judge's place, and present this motion, a copy of which is attached.

**This motion will be presented and heard telephonically.** No personal appearance in court is necessary or permitted. To appear and be heard telephonically on the motion, you must set up and use an account with Court Solutions, LLC. You can set up an account at [www.Court-Solutions.com](http://www.Court-Solutions.com) or by calling Court Solutions at (917) 746-7476.

**If you object to this motion** and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail or by the methods indicated on or before Friday, August 7, 2020.

/s/ MARILYN O. MARSHALL  
MARILYN O. MARSHALL, TRUSTEE

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**Motion to Dismiss Case For Unreasonable Delay**

Comes now Marilyn O. Marshall, Standing Trustee, and requests that this case be dismissed, as Debtor(s) failed to file the required documents pursuant to 11 USC §521, §1307, §349, and Rule 3015, and in support thereof states the following:

1. Debtor(s) filed for Chapter 13 on 02/14/2020.
2. The debtor(s) have failed to address the proof of claim filed by the Internal Revenue Service regarding unfiled tax returns for tax year(s) 2017 2018 2019.
3. The debtor's failure to confirm a plan in a timely manner constitutes unreasonable delay.

WHEREFORE, the Trustee prays that this case be dismissed, and for any and all other relief this court deems just and proper.

Office of the Chapter 13 Trustee  
224 S Michigan Ave  
Ste 800  
Chicago, IL 60604  
(312) 431-1300

/s/ MARILYN O. MARSHALL  

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MARILYN O. MARSHALL, TRUSTEE